

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2 290 BROADWAY NEW YORK, NEW YORK 10007-1866

MAR 3 1 2016

## PROMPT REPLY NECESSARY <u>CERTIFIED MAIL: RETURN RECEIPT REQUESTED</u>

D. Evan van Hook Corporate Vice President Health, Safety, Environment, Product Stewardship, and Sustainability Honeywell International, Inc. 115 Tabor Road Morris Plains, NJ 07950

Mr. Edward J. Canning Global Environmental Health and Safety (EHS) Manager Saint-Gobain Performance Plastics Corporation 14 McCaffrey Street Hoosick Falls, New York 12090

RE: IMPORTANT LEGAL MATTER – PROMPT REPLY REQUESTED; Soil Sampling in Hoosick Falls, Rensselaer County, New York

Dear Sirs:

The U.S. Environmental Protection Agency ("EPA") is charged with responding to the release or threatened release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §§ 9601-9675.

As you are aware, EPA, along with the New York State Department of Environmental Conservation ("NYSDEC") and the New York State Department of Health ("NYSDOH"), have documented the release and/or threatened release of perfluorooctanoic acid ("PFOA") to the groundwater and the public water supply of the Village of Hoosick Falls, New York ("the Village"). EPA and NYSDEC have conferred on the need for the collection of certain sampling data and agreed that EPA will take the lead role in obtaining or overseeing the below-described data collection effort.

By this letter, EPA wishes to determine whether Saint-Gobain Performance Plastics ("Saint-Gobain") and/or Honeywell International, Inc. ("Honeywell") are willing to perform a limited soil sampling investigation in the Village. The purpose of this sampling investigation is to

determine whether there are impacts to certain properties in the general vicinity of the Saint Gobain-McCaffrey Street facility associated with releases from that facility, and if so, whether the impacts are such that a cleanup action at one or more of those properties is needed. The sampling will include soils in the following areas: residential properties located on Carey Avenue, primarily between Water Works Road and McCaffrey Street; the swampy area southeast of the Saint-Gobain-McCaffrey Street facility; and the football field and picnic area at the end of Water Works Road (southwest of the ballfields and the water treatment plant). The attached sampling plan/scope of work provides more detail on the sampling locations and parameters for this work.

Please advise EPA within 10 days of the date of this letter whether Saint-Gobain and/or Honeywell is/are willing to conduct the sampling described in the attached sampling plan/scope of work under an administrative order on consent ("AOC") under Section 122(d)(3) of CERCLA, 42 U.S.C. §9622(d)(3), that EPA and the company/companies will negotiate. or whether either or both of your respective companies would prefer to provide funding for EPA to perform such response activities. Your response to this letter should be sent by e-mail to:

Lauren P. Charney Assistant Regional Counsel US EPA Region 2 290 Broadway, 17th Floor New York, NY 10007 charney.lauren@epa.gov

## and

Margaret Gregor
On-Scene Coordinator, US EPA Region 2
Emergency and Remedial Response Division
2890 Woodbridge Avenue, MS-211
Edison, NJ 08837
gregor.margaret@epa.gov

The negotiation of the AOC would need to be done on an expedited basis. Upon your companies' receipt of the draft AOC, EPA anticipates that it would be negotiated and finalized within 21 days thereafter.

Please contact me at your earliest convenience should you have any questions or concerns, or have your attorney contact Lauren Charney at charney lauren@epa.gov or 212-637-3181.

Thank you for your prompt attention to this matter.

Sincerely,

Nicoletta Di Forte, Deputy Director of Enforcement Emergency and Remedial Response Division

Nicoletta Direct

Enclosure

cc: Chris Gibson, Esq., Counsel for Saint Gobain (via e-mail)

Dale Desnoyers, Esq., Counsel for Honeywell (via e-mail)

## McCaffrey St. off-site area sampling investigation First draft, preliminary, confidential

The purpose of this sampling investigation is to determine potential off-site impacts associated with past operations at the McCaffrey Street facility, including from air deposition and releases/discharges to the ground surface in the following areas: residential properties located on Carey Avenue primarily between Water Works Road and McCaffrey Street; the swampy area southeast of the facility; and the football field and the picnic area at the end of Water Works Road (southwest of the ballfields and the water treatment plant).

An estimated 19 sampling locations would be tested from approximately 12 to 13 residential properties located on Carey Avenue primarily between Water Works Road and McCaffrey Street, and a couple of locations west of McCaffrey Street. In addition, three sample locations within the swampy area, up to two water/sediment sample locations from a ponded area within the swamp, and an estimated nine sample locations from the football field and picnic area would be tested. All total there would be up to 33 sample locations.

Each of the designated soil sample locations (31) will have samples collected from two shallow depths (0-3 inches and 3-12 inches). A targeted fraction of these locations (approximately 33%) would have additional samples collected at a variety of depths down to the water table. All samples collected would be analyzed for the comprehensive list of PFCs and a full suite of target analytes.

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